



U.S. Department
of Transportation
**Federal Aviation
Administration**

Memorandum

Subject: **INFORMATION**: AIR-200 Policy Memorandum
#98-15, Aircraft Certification Systems Evaluation
Program (ACSEP) Document Clearance Process

Date: NOV 27 1998

From: Manager, Production & Airworthiness Certification
Division, AIR-200

Reply to
Attn. of:

To: All Directorate Managers
All Manufacturing Inspection Offices and District/Satellite
Offices
All Aircraft Certification Offices

Discussions by the Aircraft Certification Systems Evaluation Program (ACSEP) National Continuous Improvement Team (NCIT) in 1997 and 1998 identified a need to improve upon the current document clearance office process whereby ACSEP directives and guidance are reviewed and approved for issuance. The traditional method of obtaining directorate concurrence generally involves a redistribution of the draft document within directorate offices, collection and compilation of applicable comments, and formal concurrence or non-concurrence with the draft document. This method usually imposes a time restraint for review, which can be time- and resource-intensive for the reviewers, and which also has the potential to preclude experienced staff personnel from the review process.

With the issuance of AIR-200 Policy Memorandum #97-06, Aircraft Certification Systems Evaluation Program (ACSEP) Quality Improvement Program, on March 25, 1997, an NCIT and Directorate/Division Continuous Improvement Team (DCIT) improvement strategy was formalized. Through this strategy, the NCIT and DCITs involve headquarters and directorate staff and managers in the discussions on specific improvement proposals, and arrive at a consensus concerning the actions to be taken on these proposals. In effect, the NCIT and the DCITs perform a clearance office process on each specific improvement proposal. Recognizing this, the NCIT and the DCITs have agreed to adapt this strategy to the clearance office review process for ACSEP documents.

The procedure described in this memorandum does not replace the clearance procedure outlined in Order 1320.1D, FAA Directives System, and Order 1320.46A, Advisory Circular System. The procedure described below is designed to operate within the structure of the clearance process outlined in the referenced orders. This procedure is applicable only to directives and guidance prepared for ACSEP.

The procedure described in this memorandum will be prototyped from the date of issuance of this memorandum until completion of the clearance process for the next change to Order 8100.7A, or subsequent revision, whichever occurs first. At the end of the prototype period, the ACSEP NCIT/DCITs will review the document clearance process and recommend any changes or further improvements that may be required.

Preliminary Clearance Process

The preliminary clearance process uses the established ACSEP NCIT/DCIT structure to review proposed improvements to ACSEP directives and guidance, and to reach a consensus concerning action to be taken on these improvements. Since the ACSEP NCIT/DCITs are composed of representatives of the managers and staff who normally participate in the formal clearance office review process, consensus on individual proposals generally should also be considered as consensus by the formal clearance office review participants. Compliance with the following procedures should ensure that consensus is truly representative:

- a. Any proposal for improvement to ACSEP directives and guidance will be submitted by the proposer to the local DCIT. This proposal may be given to any DCIT member by any individual. Each proposal will be reviewed by the DCITs to identify the need for what is being proposed, the impact on FAA resources and the customer, and the feasibility of adopting the proposal. A DCIT may develop an alternate proposal as required to better address the need or minimize anticipated impacts. All proposals accepted by the DCIT will be submitted to the NCIT.
- b. The NCIT will review each proposal for improvement and determine the appropriate action to be taken. If the proposal is accepted for discussion, the NCIT will submit the proposal to all the DCITs.
- c. Each proposal submitted to the DCITs by the NCIT will be reviewed by the DCITs to identify the need for what is being proposed, the impact on FAA resources and the customer, and the feasibility of adopting the proposal. A DCIT may develop an alternate proposal as required to better address the need or minimize anticipated impacts.
- d. The DCITs will submit to the NCIT all comments on the proposal, including any alternate proposal that may have been developed. The DCITs will determine the extent of support for the proposal, or alternate proposal, within their respective organizations and advise the NCIT. If a DCIT does not support a proposal, it will provide a justification to the NCIT.
- e. The NCIT will review the DCIT submittals and take the following actions:
 - (1) If an alternate proposal is submitted, the NCIT will evaluate it, determine the effect of other DCIT comments, modify it when appropriate, and resubmit it to all DCITs for consideration as described in paragraph c above.
 - (2) If consensus by the DCITs cannot be obtained for a proposal, the NCIT will determine if further action will be taken.

(3) If all DCITs support a proposal, the NCIT will recommend that the appropriate text be prepared, and will determine how soon the applicable text should be incorporated into the appropriate ACSEP document. The following procedures describe the process for preparing and reviewing the applicable text of the draft document:

(a) The NCIT will assign a team member or members to prepare the applicable text of the draft document.

(b) The NCIT will review the completed text of the draft document to verify proper incorporation of the proposal.

(c) The NCIT will submit the completed text of the draft document to the DCITs for review and concurrence.

(d) Each DCIT will provide the NCIT with a signed concurrence or non-concurrence, including any applicable comments.

(e) The NCIT will disposition the DCIT comments and coordinate resolution of any non-concurrences with the respective DCIT(s).

Filing of Preliminary Clearance Process Documentation

The NCIT will provide all coordinated completed text of draft documents, signed concurrences, and disposition of comments to the AIR-200 NCIT member. The AIR-200 NCIT member will provide this documentation to the AIR-200 ACSEP policy team. The AIR-200 ACSEP policy team will file these documents in a manner appropriate to accomplish document incorporation within the time frame recommended by the NCIT. The AIR-200 ACSEP policy team will determine the proper document type required (i.e., Policy Memorandum, Notice, change, or revision) and recommend project initiation to the AIR-230 manager.

Formal Clearance Process

When an ACSEP document has reached the final draft stage, the AIR-200 ACSEP policy team will prepare the proper documentation to obtain formal concurrence. For a Notice or Order, a clearance record will be prepared in accordance with Order 1320.1D. For an Advisory Circular, a clearance record will be prepared in accordance with Order 1320.46A. For a Policy Memorandum, formal coordination will be in accordance with AIR-200 Operating Procedure IV-2 and Operating Agreements - FAA Policy Focal Points. In all cases, a statement will be included to indicate that the content of the draft document has received preliminary concurrence through the ACSEP DCIT/NCIT preliminary clearance process. A copy of all signed concurrences obtained during the preliminary clearance process will be included with the final draft document. Since the preliminary clearance process is designed to accomplish the document review traditionally conducted during the formal concurrence process, a shorter comment period will be established for ACSEP documents. As a general rule, the comment period will be 10 working days.

This memorandum has been coordinated with the Aircraft Engineering Division, AIR-100. If there are any questions, please contact a member of the Production and Airworthiness Certification Division, AIR-200, at (202) 267-8361.

/s/

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